

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---|---|---|
| In Re: |) | Case No. 18-42931-705 |
| |) | |
| SHANNEL R. BALLARD MOORE, |) | Chapter 7 |
| |) | |
| Debtors, |) | TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY |
| |) | |
| SELECT PORTFOLIO SERVICING, INC., |) | |
| As servicer for, Deutsche Bank National |) | Hearing Date: July 17, 2018 |
| Trust Company, as Trustee, on behalf of the |) | Hearing Time: 9:30 a.m. |
| Holders of the J.P. Morgan Mortgage |) | Courtroom 7 South |
| Acquisition Trust 2007-CH5 Asset Backed |) | Response Deadline: July 10, 2018 |
| Pass-Through Certificates, Series 2007-CH5, |) | |
| |) | |
| SHANNEL R. BALLARD-MOORE, |) | |
| |) | |
| and |) | |
| |) | |
| TRACY A. BROWN, |) | |
| |) | |
| Chapter 7, Trustee, |) | |
| |) | |
| Respondents. |) | |

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Tracy A. Brown, Chapter 7 Trustee, and for her Response to the Motion for Relief from Automatic Stay filed by Select Portfolio Servicing, Inc., states as follows:

1. Trustee is investigating the value of the real estate and believes there may be equity available to pay unsecured creditors.
2. Trustee requests a continuance of 120 days on this matter to pursue a short sale.

Trustee prays that this Court enter an Order denying Movant's Motion for Relief.

The Law Office of Tracy A. Brown, P. C.

By: /s/
Tracy A. Brown #47074MO
Trustee in Bankruptcy
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(314) 644-0333 fax

Certificate of Service

I certify that a true and correct copy of the foregoing document was filed electronically on June 19, 2018 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, postage fully pre-paid, address to those parties listed below on June 19, 2018:

Shannel R. Ballard Moore
Debtor
3959 Thomas Drive
St. Louis, MO 63134

/s/
Debbie Gibson